

UNITED STATES DISTRICT COURT  
DISTRICT OF CONNECTICUT

DAVID D. HENWOOD,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No.
	)	3:01CV996(AWT) (DFM)
UNISOURCE WORLDWIDE, INC.	)	
	)	
and	)	
	)	
GEORGIA-PACIFIC CORPORATION,	)	April 14, 2004
	)	
Defendants.	)	

**DEFENDANTS' MOTION TO REOPEN DISCOVERY AND  
FOR ENLARGEMENT OF TIME**

Pursuant to Rule 7(b)(2) of the Local Rules of this Court, Defendants Unisource Worldwide, Inc. and Georgia-Pacific Corporation ("Defendants") respectfully move this Court to reopen discovery and to grant a short extension of the time period set forth in this Court's March 15, 2004 order in which Defendants can supplement their Motion for Summary Judgment.

In support of this motion, Defendants state the following:

1. By Order dated March 15, 2004, this Court granted Plaintiff leave to amend his Complaint to add a promissory estoppel claim. By this same Order, this Court gave Defendants until April 14, 2004 to supplement their Motion for Summary Judgment, which was filed on November 17, 2003.

2. Because there was no promissory estoppel claim pending during the time that Defendants conducted discovery, Defendants did not pursue certain discovery relevant to that claim. Now that the Court has granted leave to add this new claim, Defendants are seeking leave to reopen discovery for the limited purpose of Plaintiff's promissory estoppel claim so that Defendant can effectively pursue summary judgment on that claim. Defendants anticipate that such discovery will consist primarily, and perhaps exclusively, of briefly re-opening the deposition of Plaintiff David Henwood for the limited purpose of asking questions pertaining to his new claim.

3. In order that Defendants will have time to engage in this limited discovery and prepare summary judgment on Plaintiff's promissory estoppel claim, Defendants are also seeking a short extension of the time period in which to supplement its Motion for Summary Judgment. Specifically, Defendants are requesting that the current April 14, 2004 deadline be extended until June 1, 2004.

4. This is the first request made by Defendants to reopen discovery and for an extension of time in which to supplement their Motion for Summary Judgment.

5. Defendants have conferred with Plaintiff's counsel about this request and Plaintiff's counsel consents to reopen discovery for this limited purpose and to the requested extension.

6. For the reasons set forth above, Defendants respectfully assert that good cause exists for the granting of this motion.

For these reasons, Defendants respectfully request that this Court grant this motion, allow Defendants to reopen discovery and extend the deadline for supplementing their Motion for Summary Judgment until June 1, 2004.

THE DEFENDANTS,

UNISOURCE WORLDWIDE, INC. and  
GEORGIA-PACIFIC CORP.

By \_\_\_\_\_  
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CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing was sent by fax and by U.S. Mail, postage prepaid, to the following counsel of record on this 14th day of April, 2004:

Daniel M. Young  
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